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7 | Attorney for Plaintiff
CALIFORNIA SPORTFISHING PROTECTION ALLIANCE

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

12 CALIFORNIA SPORTFISHING PROTECTION
ALLIANCE, a non-profit corporation,

Case No.: 4:22-cv-05384-DMR

Plaintiff,

**NOTICE OF LODGING OF [PROPOSED]
CONSENT DECREE; REQUEST FOR
ENTRY OF [PROPOSED] CONSENT
DECREE**

15 CASS, INC., a California corporation,

Defendant.

1 WHEREAS, on September 28, 2022, CALIFORNIA SPORTFISHING PROTECTION
 2 ALLIANCE, (“Plaintiff”) and Defendant CASS, INC. (“Defendant”) (collectively, “the Parties”)
 3 agreed on a tentative settlement resolving the issues raised in Plaintiffs’ complaint; and

4 WHEREAS, on September 29, 2022, Plaintiff filed a Notice of Tentative Settlement and
 5 requested the Court not sign the Consent Decree until a mandatory period for comment by the United
 6 States had passed pursuant to United States Code, title 33, section 1365(c)(3) and Code of Federal
 7 Regulations, title 40, section 135.5 (ECF #10); and

8 WHEREAS, on October 4, 2022, Plaintiff filed a Notice of Commencement of 45-Day
 9 Review Period, which advised the Court that the United States had acknowledged receipt of the
 10 Consent Decree and would notify the Court of any objections to the Consent Decree, (ECF #11); and

11 WHEREAS, on November 10, 2022, the United States Department of Justice notified Plaintiff
 12 via electronic mail that the United States does not object to the Court’s entry of the Consent Decree
 13 into judgment; as the Agencies have indicated that they have no objection to entry, the Court may
 14 now enter the [Proposed] Consent Decree, which includes a request that the Court retain jurisdiction
 15 to enforce the terms of the [Proposed] Consent Decree if necessary.

16 WHEREAS, on September 29, 2022, Plaintiff submitted a [Proposed] Consent Decree to the
 17 Court for approval and entry.

18 THEREFORE, Plaintiff hereby requests the Court sign the [Proposed] Consent Decree, a true
 19 and correct copy of which is attached to this Notice of Lodging as “Exhibit 1,” and enter the Consent
 20 Decree as judgment.

21
 22 DATED: November 14, 2022

23
 24 /s/Anthony M. Barnes
 25 Anthony M. Barnes
 26 Aqua Terra Aeris Law Group
 27 Attorneys for Plaintiff
 28 CALIFORNIA SPORTFISHING
 PROTECTION ALLIANCE